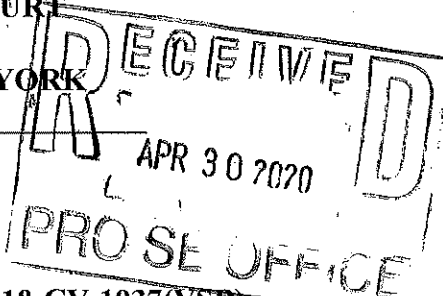


UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK



Michael Jones,,

Petitioner,

Docket No. 18-CV-1937(VSB)

v.

The City of New York

Defendant.

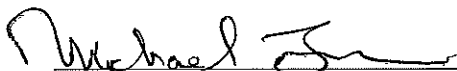
To Hon. Vernon S. Broderick, Judge of the United States District Court for the South District.

I, Michael Jones, respectfully respond to this Courts Opinion and Order date April 6, 2020 concerning defendant Jorge Villalobos and the dates in which I was seen by her. I have not received the Courts decision as of yet and only came across it on April 16, 2020 while at work in the facilities Law Library. Please find enclosed the Medical reports dated, March 23, 2015, January 5, 2015, and November 18, 2014, which confirm that defendant Villalobos in fact saw me on those dates. (See Att – A).

I have also included an Amended Complaint that contains the names of the Correctional Captains and Officers who were listed as John Doe in the original Complaint. I was provided with the names during discovery. (See Att – B). I am still in the process of attempting to obtain the roles each defendant played during the search through further discovery.

As such, I respectfully ask that the time of discovery be extended because I have requested more documents/evidence from the defendants after the receipt of documents in which they have already provided. The defendant's will not be prejudice by an extension.

I Michael Jones, certify under the penalty of perjury that I have placed this request in the mailbox at Sing Sing Correctional Facility on April 22, 2020 and mailed a copy to Sharon Sprayregen, Esq., the Assistant Corporation Counsel and Bruce M. Brady, Esq. the attorney's in this matter.


Michael Jones, Plaintiff, Pro se

ATTACHMENT-A

**JONES, MICHAEL**

NYSID: 04360588N BookCase: 8751400724
 Facility Code: GMDC Housing Area: M1B-U
 53 Y old Male, DOB: 07/26/1961
 DOWNSIDE CORR FAC, DOWNSIDE, NY

Insurance: Self Pay
 Appointment Facility: George Motchan Detention Center (C-73)

03/23/2015

Appointment Provider: Jorge Villalobos, PA

Current Medications

Gabapentin 300 MG Capsule 1 cap Twice a Day, stop date 03/30/2015
 Amlodipine Besylate 10 mg Tablet 1 tablet Once a day, stop date 04/28/2015
 Aspirin EC 81 MG Tablet Delayed Release 1 tablet Once a day, stop date 04/28/2015
 Zocor 20 mg Tablet 1 tab At Bedtime, stop date 04/28/2015

Past Medical History

Hypertension since 4/2004
 Itch of skin NOS
 Itch of skin NOS
 URI [Upper respiratory infection]
 Toothache
 Dental abscess
 Rhinitis NOS

Allergies

N.K.D.A.

Reason for Appointment

1. Back pain ,med refill

History of Present Illness**VISIT COMPLEXITY SCALE:**

Pt with hx chronic LBP, s/p back surgery. Pt in clinic, requesting refill Celebrex.

NON-INTAKE ACUITY

Non-Intake Acuity Scale 2: *Complicated sick call (problem requiring diagnostic evaluation, documented history, physical exam, specified follow up) OR One chronic condition addressed with components specified in (3)*

Vital Signs

BP		
122/80	03/23/2015 02:11:22 PM	Jorge Villalobos
Pulse		
68	03/23/2015 02:11:22 PM	Jorge Villalobos
RR		
14	03/23/2015 02:11:22 PM	Jorge Villalobos
Temp		
98.3	03/23/2015 02:11:22 PM	Jorge Villalobos

Past Orders

Lumbar Spine AP, Lateral and Lateral L5-S1 (XRAY) (Order Date - 12/20/2014) (Collection Date - 12/24/2014)

Result: Abnormal/ Positive/ Reactive

Notes: Cantor, Lourdes, PA 12/26/2014 4:44:58 PM > STUDY: LUMBOSACRAL SPINE X-RAY. CLINICAL HISTORY: Low back pain. TECHNIQUE: AP and lateral radiographs of the lumbosacral spine. FINDINGS: AP and lateral radiographs demonstrate a posterior fusion with metallic rods and pins transfixing the L4-5 and L5-S1 disc space levels as well as bony densities. The metallic bullets over the left inguinal region and two metallic densities over the right side of the

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 03/23/2015

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

pelvis of unknown etiology. There is a normal alignment of vertebral bodies. No fractures or destructive lesions are present. No spondylolysis or spondylolisthesis is present. IMPRESSION: Status post posterior fusion of L4-5 and L5-S1 disc space levels. Report Electronically Signed by: Ronald Schlifman Report Signed on: 12/24/2014 3:25 PM Send to facility Team Leaders.

Examination

General Examination:

GENERAL APPEARANCE: no acute distress.
NECK: supple.
HEART: RATE:-, regular, RHYTHM:-, regular.
LUNGS: clear to auscultation bilaterally.
EXTREMITIES: normal ROM.

Back:

INSPECTION: + old healed surgical scar mid lower spine region..
PALPATION: positive tenderness midline.
RANGE OF MOTION: normal.
MOTOR STRENGTH: 5/5 all groups bilaterally.
GAIT: normal.

Assessments

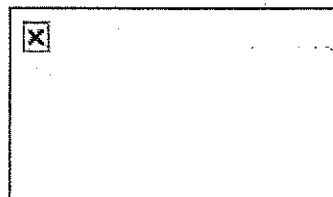
1. LBP [Low back pain] - 724.2, s/p spinal fusion

Treatment

1. LBP [Low back pain]

Start Celebrex Capsule, 200 MG, 1tab, Orally, Daily, 7 days, Pharmacy
Pt ed. Rtc prn.

Appointment Provider: Jorge Villalobos, PA



Electronically signed by Jorge Villalobos PA on 03/23/2015 at 02:15 PM EDT

Sign off status: Completed

George Motchan Detention Center (C-73)

15-15 Hazen Street
East Elmhurst, NY 11370
Tel: 718-546-4550
Fax:

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 03/23/2015

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

**JONES, MICHAEL**

NYSID: 04360588N BookCase: 8751400724

Facility Code: GMDC Housing Area: M1B-U

53 Y old Male, DOB: 07/26/1961

DOWNSTATE CORR FAC, DOWNSTATE, NY

Insurance: Self Pay

Appointment Facility: George Motchan Detention Center (C-73)

01/05/2015

Appointment Provider: Jorge Villalobos, PA

Current Medications

Aspirin EC 81 MG Tablet Delayed Release 1 tablet Once a day, stop date 02/01/2015
 Amlodipine Besylate 10 mg Tablet 1 tablet Once a day, stop date 02/01/2015
 Zocor 20 mg Tablet 1 tab At Bedtime, stop date 02/01/2015
 Gabapentin 300 MG Capsule 1 cap Twice a Day, stop date 03/30/2015

Past Medical History

Hypertension since 4/2004
 Itch of skin NOS
 Itch of skin NOS
 URI [Upper respiratory infection]
 Toothache
 Dental abscess
 Rhinitis NOS

Allergies

N.K.D.A.

Reason for Appointment

1. S/c

History of Present Illness**VISIT COMPLEXITY SCALE:****NON-INTAKE ACUITY**

Non-Intake Acuity Scale 2: *Complicated sick call (problem requiring diagnostic evaluation, documented history, physical exam, specified follow up) OR One chronic condition addressed with components specified in (3)*

Pt with hx chronic LBP s/p back surgery 2006. Pt in clinic, requesting refill Celebrex for pain.

Vital Signs

BP		
137/87	01/05/2015 09:10:25 AM	Jorge Villalobos
Pulse		
78	01/05/2015 09:10:25 AM	Jorge Villalobos
RR		
16	01/05/2015 09:10:25 AM	Jorge Villalobos
Temp		
98.0	01/05/2015 09:10:25 AM	Jorge Villalobos

Examination**General Examination:**

GENERAL APPEARANCE: no acute distress, ambulating well..

NECK: supple.

HEART: RATE:-, regular, RHYTHM:-, regular.

LUNGS: clear to auscultation bilaterally, no wheezes/ rhonchi/ rales.

Back:

INSPECTION: normal contour, healed scar lower back..

PALPATION: positive tenderness right paraspinals, positive tenderness left paraspinals.

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 01/05/2015

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

RANGE OF MOTION: normal.
MOTOR STRENGTH: 5/5 all groups bilaterally.
GAIT: normal.

Assessments

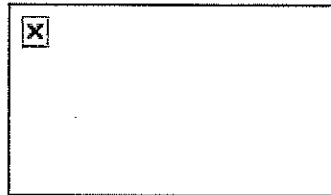
1. Degenerative disc disease - 722.6

Treatment

1. Degenerative disc disease

Start Celebrex Capsule, 200 MG, 1tab, Orally, Daily, 7 days, Pharmacy
Pt ed. Rtc prn.

Appointment Provider: Jorge Villalobos, PA



Electronically signed by Jorge Villalobos PA on 01/05/2015 at
09:17 AM EST

Sign off status: Completed

George Motchan Detention Center (C-73)
15-15 Hazen Street
East Elmhurst, NY 11370
Tel: 718-546-4550
Fax:

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 01/05/2015

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

**JONES, MICHAEL**

NYSID: 04360588N BookCase: 8751400724

Facility Code: GMDC Housing Area: M1B-U

53 Y old Male, DOB: 07/26/1961

DOWNSTATE CORR FAC, DOWNSTATE, NY

Insurance: Self Pay

Appointment Facility: George Motchan Detention Center (C-73)

11/18/2014

Appointment Provider: Jorge Villalobos, PA

Current Medications

Aspirin EC 81 MG Tablet Delayed Release 1 tablet Once a day, stop date 02/01/2015
 Amlodipine Besylate 10 mg Tablet 1 tablet Once a day, stop date 02/01/2015
 Zocor 20 mg Tablet 1 tab At Bedtime, stop date 02/01/2015

Past Medical History

Hypertension since 4/2004

Allergies

N.K.D.A.

Reason for Appointment

1. S/c

History of Present Illness**VISIT COMPLEXITY SCALE:****NON-INTAKE ACUITY**

Non-Intake Acuity Scale 2: *Complicated sick call (problem requiring diagnostic evaluation, documented history, physical exam, specified follow up) OR One chronic condition addressed with components specified in (3)*

Pt c/o having a cold. Pt c/o stuffy nose, scratchy throat x past 2d. Denies fever, headache, cp, sob.

Pt also requesting renewal Celebrex for chronic back pain, s/p surgery.

Vital Signs

BP		
134/79	11/18/2014 08:51:21 AM	Jorge Villalobos
Pulse		
65	11/18/2014 08:51:22 AM	Jorge Villalobos
RR		
16	11/18/2014 08:51:22 AM	Jorge Villalobos
Temp		
97.4	11/18/2014 08:51:22 AM	Jorge Villalobos

Examination**General Examination:**

GENERAL APPEARANCE: no acute distress.

HEENT: EYES:-, conjunctiva clear, NOSE:-, turbinates red and swollen, THROAT:-, no erythema or exudate.

NECK: supple.

HEART: RATE:-, regular, RHYTHM:-, regular.

LUNGS: clear to auscultation bilaterally, no wheezes/rhonchi/rales.

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 11/18/2014

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Assessments

1. Rhinitis NOS - 472.0 (Primary)
2. LBP [Low back pain] - 724.2

Treatment**1. Rhinitis NOS**

Start Sudafed Tablet, 30 mg, 2 tabs, Orally, Twice a Day, 5 days,

Pharmacy, Refills 0

Pt ed. Increase po fluids. Rtc prn.

2. LBP [Low back pain]

Start Celebrex Capsule, 200 MG, 1 cap, Orally, Daily, 7 days, Pharmacy, Refills 0

Appointment Provider: Jorge Villalobos, PA



Electronically signed by Jorge Villalobos PA on 11/18/2014 at 09:05 AM EST



Sign off status: Completed

George Motchan Detention Center (C-73)
15-15 Hazen Street
East Elmhurst, NY 11370
Tel: 718-546-4550
Fax:

Patient: JONES, MICHAEL DOB: 07/26/1961 Progress Note: Jorge Villalobos, PA 11/18/2014

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

ATTACHMENT-B

		THE CITY OF NEW YORK DEPARTMENT OF CORRECTION SPECIAL SEARCH TASK FORCE					
CONSISTING OF: <input checked="" type="checkbox"/> SPECIAL SEARCH TEAM (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> EMERGENCY SERVICE UNIT		<input type="checkbox"/> INTELLIGENCE UNIT <input checked="" type="checkbox"/> CANINE UNIT					
DATE: <u>4/14/15</u>				TIME SEARCH TEAM WAS ACTIVATED: <u>0500</u>			
FACILITY SEARCHED: <u>W/F / ADC</u> <u>TNT Court production Central Intake</u>				SUPERVISORS: CAPTAINS: <u>Mitchell #1250</u>			
CORRECTION OFFICERS							
NAME	SHIELD	DOA	COMMAND	NAME	SHIELD	DOA	COMMAND
Murphy Wayne	15646	10/23/97	AMKC	Draper Michael	15553	12/7/00	
Johnson Darian	1295	8/15/04	GMDC				
Haze Jeremiah	7155	5/26/11	GRVC				
Cruz Javier	3244	9/6/12	GRVC				
Nieves Eric	4508	4/17/97	GRVC				
DiTommaso Chris	3845	6/29/06	WF				
Estrella Hector	10631	8/7/08	GRVC				
Palcini John	9604	7/23/87	AMKC				
Hertz Fred	18147	6/29/06	OBCC				
Pullan Robert	14946	7/1/96	AMKC				
JAIL BUS # STATISTICS							
HOUSING AREA	CELLS DORM	TOTAL BEDS	TOTAL CENSUS	IN	OUT	#SRG	CONTRABAND YES/NO
	NIC	357B	3				No
	GMDC	350B	19				No
	GRVC	350B	7				No
	GMDC	351B	7				No
	GRVC	351B	7				No
	AMKC	356B	26				No
VIDEO RECORDER: <u>Cruz # 3244</u>							
RECORDER: <u>DiTommaso #3845</u>							
TOTAL NUMBER OF BEDS SEARCH: _____							
TOTAL NUMBER OF INMATES SEARCH: _____							
TOTAL NUMBER OF CONTRABAND RECOVERED							
TOTAL NUMBER OF WEAPONS		TOTAL NUMBER OF DRUG FINDS		TOBACCO PRODUCTS		OTHER	
TIME STARTED:				TIME COMPLETED:			
TOTAL STAFF:				COMMAND POST NUMBER:			

NYC 000418

SPECIAL SEARCH TASK FORCE



☐ INTELLIGENCE UNIT
☒ CANINE UNIT

0500

CAPTAINS: Mitchell #1250



CORRECTION OFFICERS

STATISTICS

TOTAL NUMBER OF INMATES SEARCH:

TOTAL NUMBER OF CONTRABAND RECOVERED	
1937	1,000
1938	1,200
1939	1,500
1940	1,800
1941	2,000
1942	2,200
1943	2,500
1944	2,800
1945	3,000
1946	3,200
1947	3,500
1948	3,800
1949	4,000
1950	4,200
1951	4,500
1952	4,800
1953	5,000
1954	5,200
1955	5,500
1956	5,800
1957	6,000
1958	6,200
1959	6,500
1960	6,800
1961	7,000
1962	7,200
1963	7,500
1964	7,800
1965	8,000
1966	8,200
1967	8,500
1968	8,800
1969	9,000
1970	9,200
1971	9,500
1972	9,800
1973	10,000
1974	10,200
1975	10,500
1976	10,800
1977	11,000
1978	11,200
1979	11,500
1980	11,800
1981	12,000
1982	12,200
1983	12,500
1984	12,800
1985	13,000
1986	13,200
1987	13,500
1988	13,800
1989	14,000
1990	14,200
1991	14,500
1992	14,800
1993	15,000
1994	15,200
1995	15,500
1996	15,800
1997	16,000
1998	16,200
1999	16,500
2000	16,800
2001	17,000
2002	17,200
2003	17,500
2004	17,800
2005	18,000
2006	18,200
2007	18,500
2008	18,800
2009	19,000
2010	19,200
2011	19,500
2012	19,800
2013	20,000
2014	20,200
2015	20,500
2016	20,800
2017	21,000
2018	21,200
2019	21,500
2020	21,800
2021	22,000
2022	22,200
2023	22,500
2024	22,800
2025	23,000
2026	23,200
2027	23,500
2028	23,800
2029	24,000
2030	24,200
2031	24,500
2032	24,800
2033	25,000
2034	25,200
2035	25,500
2036	25,800
2037	26,000
2038	26,200
2039	26,500
2040	26,800
2041	27,000
2042	27,200
2043	27,500
2044	27,800
2045	28,000
2046	28,200
2047	28,500
2048	28,800
2049	29,000
2050	29,200
2051	29,500
2052	29,800
2053	30,000
2054	30,200
2055	30,500
2056	30,800
2057	31,000
2058	31,200
2059	31,500
2060	31,800
2061	32,000
2062	32,200
2063	32,500
2064	32,800
2065	33,000
2066	33,200
2067	33,500
2068	33,800
2069	34,000
2070	34,200
2071	34,500
2072	34,800
2073	35,000
2074	35,200
2075	35,500
2076	35,800
2077	36,000

NYC 000419

	<p>THE CITY OF NEW YORK DEPARTMENT OF CORRECTION</p> <h2 style="margin: 0;">SPECIAL SEARCH TASK FORCE</h2>						
<p>CONSISTING OF: <input checked="" type="checkbox"/> SPECIAL SEARCH TEAM <input type="checkbox"/> INTELLIGENCE UNIT (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> EMERGENCY SERVICE UNIT <input checked="" type="checkbox"/> CANINE UNIT</p>							
DATE: <u>April 22, 2015</u>		TIME SEARCH TEAM WAS ACTIVATED: <u>1500 HOURS</u>					
FACILITY SEARCHED: <u>CENTRAL INTAKE / COURT RETURNS</u>		SUPERVISORS: CAPTAINS: <u>DEBCHA #1630 GARCIA #1632</u>					
CORRECTION OFFICERS							
NAME	SHIELD	DOA	COMMAND	NAME	SHIELD	DOA	COMMAND
MARTIN, FRANCIS	9727	06.06.02	GRVC	HENRY, EMIL	9649	11.20.02	GMDC
GRAINGER, CAROLYN	18108	06.29.06	GRVC	DESSOUQUES RALPH	10152	06.07.01	GMDC
JOHNSON, ANTHONY	17923	01.17.08	AMKC	GUDON, JOHNNIE	10443	12.08.88	N.I.C.
WHITAKER, DAVID	15271	10.12.96	AMKC	FINLEY, LOUIS	17395	11.03.05	W.F
WARD, JOEL	18963	08.27.09	AMKC	GONZALEZ, DAVID	17072	06.02.05	PMSC
GOTTLIEB, ROBERT	17533	11.03.05	AMKC	McNICHOLS, GREGORY	15733	10.23.97	OBCC
ALTADONNA, DANIEL	18768	02.28.08	EMTC	SMITH, WILLIAM	13482	04.01.99	OBCC
MERRIL, STEVEN	13163	02.12.04	EMTC	PINNEY, WILLIAM	15256	02.12.04	OBCC
TORRES, JOEY	15073	01.17.08	EMTC				
BEAZER, GEORGE	1037	07.01.96	EMTC				
STATISTICS							
HOUSING AREA	CELLS/DORM	TOTAL BEDS	TOTAL CENSUS	IN	OUT	#SRG	CONTRABAND YES/NO
Bus #1			18	14	MALES	02	FEMALES
Bus #2			28	24	MALES	04	FEMALES
Bus #3			25	25	MALES	0	FEMALES
Bus #4			27	27	MALES	0	FEMALES
TOTAL			98	98		06	
VIDEO RECORDER: <u>GRAINGER #18108</u>							
RECORDER: <u>GRAINGER #18108</u>							
TOTAL NUMBER OF BEDS SEARCH: <u>N/A</u>							
TOTAL NUMBER OF INMATES SEARCH: <u>92</u>							
TOTAL NUMBER OF CONTRABAND RECOVERED							
TOTAL NUMBER OF WEAPONS		TOTAL NUMBER OF DRUG FINDS		TOBACCO PRODUCTS		OTHER	
0		0		0		0	
TIME STARTED: <u>1700 HRS</u>				TIME COMPLETED: <u>2000</u>			
TOTAL STAFF: <u>18 OFFICERS ESU (1+10) K-9 (2+2)</u>				COMMAND POST NUMBER:			

NYC 000420

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Michael Jones,

Plaintiff,

-against-

**COMPLAINT PURSUANT
TO 42 U.S.C. §1983**

Jury Trial Demanded

18-CV-1937(VSB)

The City of New York, Joseph A. Ponte,
Olga Segal, M.D., Rostislav Davydov,
Jorge Villalobos, Francis Martin, Carolyn Grainger,
Anthony Johnson, David Whitaker, Jorel Ward,
Robert Gottlieb, Daniel Altadonna, Steven Merrill,
Joey Torres, George Beazer, Emiel Henry,
Ralph Dessoueces, Johnnie Gildon, Louis Finley,
David Gonzalez, Gregory McNichlos, William Smith,
William Pincay, Captain Garcia #1632,
Captain Deochan #1630, Wayne Murphy,
Darian Johnson, Jeremiah Haze, Javier Cruz,
Eric Nieves, Chris DiTommaso, Hector Estrella,
John Poleini, Fred Hertz, Robert Pullan,
Michael Drapan, Captain Mitchell #1250,
Corizon Health Inc., Jane Doe #1, Jane Doe #2,
Jane Doe #3.

Defendants.
-----X

COMPLAINT

I PRELIMINARY INTRODUCTION

Plaintiff in the above-caption action, allege(s) as follows:

1) Plaintiff, Michael Jones, bring this action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. §1983, against Doctors, Corizon Health Inc., Correctional Officers, Commissioner Joseph A. Ponte and The City of New York for money damages brought pursuant to 42 U.S.C. §1983, to redress the deprivation of rights secured to plaintiff by the First, Fourth, Eighth, Amendments to the United States Constitution and the aforementioned statutory provisions in their individual and official capacity.

JURISDICTION

2) This court has jurisdiction over this action pursuant to 28 U.S.C. §§1331, 1341 (a)(3), 1341 (a)(4), 1367 (a), and 42 U.S.C. §1983.

VENUE

3) Venue is proper in this District Pursuant to 28 U.S.C. §1391.

4) It is alleged that the individual Doctors, Corizon Health Inc., Correctional Officers, Commissioner Joseph A. Ponte, and The City of New York, failed to provide medical attention, and committed an illegal search.

II PARTIES IN THIS COMPLAINT:

5) Plaintiff is and was at all times relevant herein a citizen of the United States and resides at:

A). Plaintiff: Michael Jones #90-A-5292
Sing Sing Corr. Fac.
354 Hunter St.
Ossining, New York 10562

B). Defendant Number One:
Olga Segal, M.D.
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Three:
Jorge Villalobos
G.M.D.C. 15-15 Hazen Street
East Elmhurst, New York 11370

Defendant Number Four:
Francis Martin, #9727
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Five:
Carolyn Grainger, #18108
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Six:
Anthony Johnson, #17923
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Seven:
Daniel Altadonna, #18768
E.M.T.C. 10-10 Hazen Street
East Elmhurst, New York 11370

Defendant Number Eight:
David Whitaker, #15271
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Nine:
Jorel Ward, #18963
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Ten:
Robert Gottlieb, #1753
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Eleven:
Steven Merrill, #13163
E.M.T.C. 10-10 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twelve:

Joey Torres, #15073
E.M.T.C. 10-10 Hazen Street
East Elmhurst, New York 11370

Defendant Number Fourteen:

Emiel Henry, #9649
G.M.D.C. 15-15 Hazen Street
East Elmhurst, New York 11370

Defendant Number Sixteen:

Corizon Health Inc.
49-04 19th Ave. West Facility
Astoria, New York 11305

Defendant Number Eighteen:

Captain Garcia #1632
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twenty:

Johnnie Gildon, #10443
N.I.C. 16-00 Hazen St.
East Elmhurst, New York 11370

Defendant Number Twenty-two:

David Gonzalez, #17072
R.M.S.C. 19-19 Hazen St.
East Elmhurst, New York 11370

Defendant Number Twenty-four:

William Smith, #15482
O.B.C.C. 16-00 Hazen St.
East Elmhurst, New York 11370

Defendant Number Twenty-six:

Wayne Murphy, #15646
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twenty-eight:

Jeremiah Haze, #7155
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirteen:

George Beazer, #1037
E.M.T.C. 10-10 Hazen Street
East Elmhurst, New York 11370

Defendant Number Fifteen:

Ralph Dessoueces, #10152
G.M.D.C. 15-15 Hazen Street
East Elmhurst, New York 11370

Defendant Number Seventeen:

Captain Mitchell #1250
16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Nineteen:

Captain Deocgab #1630
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twenty-one:

Louis Finley, #17395
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twenty-three:

Gregory McNichlos, 15733
O.B.C.C. 16-00 Hazen St.
East Elmhurst, New York 11370

Defendant Number Twenty-five:

William Pincay, #15256
O.B.C.C. 16-00 Hazen St.
East Elmhurst, New York 11370

Defendant Number Twenty-seven:

Darian Johnson, #1295
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Twenty-nine:

Javier Cruz, #3244
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty:

Eric Nieves, #4508
G.R.V.C. 09-09 Hazen Street.
East Elmhurst, New York 11370

Defendant Number Thirty-one:

Chris DiTommaso, #3845
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-two

Hector Estrella, #10631
G.R.V.C. 09-09 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-three:

John Poleini, #9604
A.M.K.C. 18-18 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-four:

Fred Hertz, #18147
O.B.C.C. 16-00 Hazen St.
East Elmhurst, New York 11370

Defendant Number Thirty-five:

Robert Pullan, #14946
A.M.K.C. 18-18 Hazen Street.
East Elmhurst, New York 11370

Defendant Number Thirty-six:

Michael Drapan, #15553
Transportation Division
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-seven:

Jane Doe Officer #1
Transportation Division
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-eight:

Jane Doe Officer #2
Transportation Division
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Thirty-nine:

Jane Doe Officer #3
Transportation Division
West Facility 16-06 Hazen Street
East Elmhurst, New York 11370

Defendant Number Forty:

The City of New York
City Hall N.Y.
New York, New York 10007

Defendant Number Forty-one:

Joseph A. Ponte, Former Comm.
NY City Department Of Correction
75-20 Astoria Blvd.
East Elmhurst, New York 11370

III EXHAUSTION OF ADMINISTRATIVE REMEDIES:

- 6-a. There is a grievance procedure at both facilities.
- b. Plaintiff filed grievances with both facilities.
- c. Some grievances were denied, some was not answered.
- d. All the grievances were appealed.

IV PREVIOUS LAWSUITS:

- 7-a. Jones v. Smith, et al, 09-CV-1058
Northern District of New York
Hon. Gary L. Sharpe
Submitted, September 2009
Trial Verdict in Plaintiff's favor/Settlement;

- b. Jones v. Fischer, et al, 10-CV-1331
Northern District of New York
Hon. Gary L. Sharpe
Submitted, 2010
Dismissed;
- c. Jones v Breken, et al, 02-CV-55
Western District of New York
Hon. Kenneth K. Schroeder, Jr.
Submitted, July 2002
Settled in favor of Plaintiff;
- d. Jones v. Artuz, et al, 01-CV-4652
Southern District of New York
Hon. Sprizzo.
Submitted, 2001
Dismissed;
- d. Jones v. Coughlin, et al, 93-CV-7341
Southern District of New York
Hon. Charles L. Briant
Submitted, 1993
Dismissed;
- e. Jones v. DeRose, et al, Docket NA
Southern District of New York
Hon. Glasser
Submitted, File Date: January 1990
Settled in favor of Plaintiff.

V STATEMENT OF CLAIM:

8) Plaintiff, Michael Jones, brings this action claiming that defendants violated and failed to comply with State and Federal regulations denying adequate medical treatment, and illegal strip/body cavity searches in violation of his First, Forth, and Eighth, Amendments of the United States Constitution: 42 U.S.C. §1983.

9) The institution giving rise to plaintiffs claims occurred in Robert N. Davoren Center, 11-11 Hazen St., East Elmhurst, N.Y. 11370, George Motchan Detention Center, 15-15 Hazen St., East Elmhurst, N.Y. 11370, and Transportation Division, West Facility 16-06 Hazen Street, East Elmhurst, New York 11370.

10) The places within the institutions where the events occurred were in the Facility Clinics, Robert N. Davoren Center, 11-11 Hazen St., East Elmhurst, N.Y. 11370, George Motchan Detention Center, 15-15 Hazen St., East Elmhurst, N.Y. 11370, Transit Search Centers, West Facility 16-06 Hazen Street, East Elmhurst, New York 11370.

11) The approximate time of the events concerning the defendants' were a continuing occurrence beginning on May 15, 2014, through August 2015.

12) Defendant Joseph A. Ponte, is the former Commissioner of the New York Department of Corrections employed by the City of New York, instituted an unconstitutional Department wide policy for illegal body cavity strip-frisk-searches; entered into a contract with defendant Corizon Health Inc., that denied plaintiff adequate medical care; failed to train his Supervisors, Officers, and Staff and failed to maintain.

13) Defendant Corizon Health Inc., entered into a contract with defendant City Of New York and New York City Department Of Corrections that granted Corizon Health Inc. the exclusive right to provide adequate medical services to inmate confined in all of New York City Correctional Facilities. Under the contract defendant, Corizon Health Inc. was allowed to make and implement illegal policies concerning the course of treatment given to inmates.

14) Defendants, The City Of New York is a municipality in the State of New York which owns, operates, manages, directs and controls the New York City Department Of Corrections who has entered into a contract with defendant Corizon Health Inc. The New York City Department Of Corrections has granted Corizon Health Inc. the exclusive right to provide adequate medical services to inmate confined in all of New York City Correctional Facilities. Under the contract defendant, Corizon Health Inc. was allowed to make and implement illegal policies concerning the course of treatments given to inmates.

VI FACTS:

15) By operation of State and Federal Laws, plaintiff's movement is controlled by New York State Department Of Corrections and Community Supervision. From April 18, 1990, until the present, plaintiff is an inmate in the custody of the New York State Department Of Corrections and Community Supervision. All defendants are sued in their individual and official capacity.

FIRST CAUSE OF ACTION
VIOLATION OF PLAINTIFFS'
SERIOUS MEDICAL NEEDS;
CRUEL AND UNUSUAL PUNISHMENT

16) In September of 2006, plaintiff underwent a back surgery that consisted of fusing the L4-L5, and L5-S1 Lumber Spine and Laminectomy Excision of the L4-L5, and the L5-S1 herniated disk.

17) As a result of the above surgery procedure, plaintiff is required to have a special mattress to relieve the pressure from the lumber spine area when ever he is lying or sitting in bed.

18) On May 15, 2014, plaintiff arrived at the Robert N. Davoren Center, (hereafter, R.N.D.C), intake and informed the intake examiner that he underwent a back surgery in 2006, provided them with copies of his medical records and requested to be provided with a special mattress to relieve the pressure from his lumber spine. The examiner informed plaintiff that Rikers Island and Corizon Health Inc. policy prohibits them from issuing any form of special mattress no matter what the problem.

19) Plaintiff was then housed in Mode Three Upper and was given a worn down used mattress approximately one inch in thickness with rips in it causing the insulation to come out.

20) Plaintiff began to experiences extreme lower and upper back pain, stiffness in his lower back, muscle spasms, shoulder pain, loss of sleep, numbness in his hipbones, and difficulty standing as a result of the extreme back pain.

21) On May 19, 2014, plaintiff went to see Roxanne Hobbs-Green, (hereafter, Hobbs-Green), and informed her of the above medical procedure and explained the problems and pain that his mattress was causing. Hobbs-Green told plaintiff that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem, and provided plaintiff with Ibuprofen Tablet 400mg.

22) On May 22, 2014, plaintiff went to sick-call and saw Kernold Alves, (hereafter, Alves), and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Again, plaintiff was told that Rikers

Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem, and did not give plaintiff anything for his pain.

23) On May 29, 2014, plaintiff went to sick-call and saw Carole Comas, (hereafter, Comas), and complained about extreme back, shoulder, neck pain and informed her of the above medical procedure and explained the problems and pain that his mattress was causing. Again, plaintiff was told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem. Comas did not give plaintiff anything for his pain.

24) On June 18, 2014, July 15, 2014, and August 18, 2014, plaintiff went to sick-call and saw defendant Jessy Liburd, (hereafter, Liburd), and complained about extreme back, shoulder, neck pain and inform him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff explained to Liburd that the worn damaged mattress was the cause of his pain and his medical condition required him to be provided with a special mattress. Plaintiff was told that Rikers Island and Corizon Health Inc. policy prohibits them from issuing any form of special mattress no matter what the problem.

25) On July 2, 2014, plaintiff was seen by Chika Nwogwugwu, (hereafter, Nwogwugwu), and complained about the extreme back, shoulder, neck pain and inform him of the above medical procedure and explained the problems and pain that his mattress was causing. Nwogwugwu told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

26) On August 7, 2014, was transferred to the George Motchan Detention Center, (hereafter, G.M.D.C.). Plaintiff was housed in Mode One Upper and was given a worn down used mattress approximately one inch in thickness with rips in it causing the insulation to come out.

27) On August 26, 2014, and December 8, 2014, plaintiff was seen by Lynn Devivo, (hereafter, Devivo), and complained about the extreme back, shoulder, neck pain and informed her of the above medical procedure and explained the problems and pain that his mattress was causing. Devivo told that Rikers Island and Corizon Health Inc.,

policy prohibits them from issuing any form of special mattress no matter what the problem.

28) On September 3, 2014, November 25, 2014, and October 15, 2014, plaintiff was seen by defendant Yves Gauvin, (hereafter, Gauvin), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

29) On November 18, 2014, January 5, 2015, and March 23, 2015, plaintiff was seen by defendant Jorge Villalobos, (hereafter, Villalobos), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Villalobos then told plaintiff that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

30) On December 20, 2014, plaintiff was seen by Nuaemezie Umeasor, (hereafter, Umeasor), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem, but provided plaintiff with Tylenol #3.

31) On December 26, 2014, plaintiff was seen by Allareddy Reddy, (hereafter, Reddy), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

32) On November 5, 2014, plaintiff was seen by Kernold Alves, (hereafter, Alves), and complained about the extreme back, shoulder, neck pain and inform him of the above medical procedure and explain the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

33) On September 29, 2014, plaintiff was seen by Vanessa Jones, (hereafter, Jones), and complained about the extreme back, shoulder, neck pain and informed her of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem, but advised plaintiff to take another mattress when somebody leaves and place it on top of his worn mattress.

34) On September 17, 2014, plaintiff was seen by Andrew Riofrio, (hereafter, Riofrio), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

35) On September 11, 2014, and October 9, 2014, plaintiff was seen by Scott Parks, (hereafter, Parks), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

36) On January 16, 2015, and January 26, 2015, plaintiff was seen by Frank Medard, (hereafter, Medard), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

37) On February 18, 2015, plaintiff was seen by Iceyleen Cooper, (hereafter, Cooper), and complained about the extreme back, shoulder, neck pain and informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Plaintiff was then told that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

38) On April 5, 2015, plaintiff was seen by defendant Rostislav Davydov, (hereafter, Davydov), and complained about the extreme back, shoulder, neck pain and

informed him of the above medical procedure and explained the problems and pain that his mattress was causing. Davydov then told plaintiff that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

39) On December 30, 2014 and June 1, 2015, plaintiff was seen by defendant Olga Segal, (hereafter, Segal), at the West Facility and complained about the extreme back, shoulder, neck pain and informed her of the above medical procedure and explained the problems and pain that his mattress was causing. Segal then told plaintiff that Rikers Island and Corizon Health Inc., policy prohibits them from issuing any form of special mattress no matter what the problem.

SECOND CAUSE OF ACTION
**ILLEGAL STRIP/CAVITY SEARCH/
RELIGIOUS VIOLATION**

40) On the morning of April 14, 2015, plaintiff went through the normal body cavity strip-search procedure in G.M.D.C., strip area to go to court of that day.

41) After the completion of the search, plaintiff was placed in a Holding Pen to wait for the bus. Plaintiff was called out of the Holding Pen to board the bus to go to court. After plaintiff boarded the bus, the entire bus was taken to a search Facility. At that time, a defendant Captain Mitchell, and three Defendant's, who were either Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan, boarded the bus wearing Gas Masks, armed with canisters of a chemical agent known as MK9.

42) Defendant Captain Mitchell and three Defendant's, who were either Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan, wore all black uniforms with no identification tags. Defendant, Captain Mitchell began to yell in a threatening manner stating, "listen up, I want all you mother fuckers off the bus now. If you give my officers or me any shit, we will spray your ass until you fall out. Stand up walk straight off the bus and do not look back or say a word. This is the new policy handed down from the Commissioner."

43) Upon exiting the bus, either defendant's Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John

Poleini, Fred Hertz, Robert Pullan, or Michael Drapan was wearing all black uniforms, with no identification tags armed with canisters of a chemical agent known as MK9, directing plaintiff and the entire occupants of the bus to enter the search Facility building in a straight line.

44) Plaintiff was made to stand side by side shackled to another inmate while a female Jane Doe Officer #1 lead a Drug Sniffing-Dog up and down the line of inmates in the front and back of plaintiff. The drug sniffing-dog did not pick up anything during the procedure. A female Jane Doe #2 Officer was filming the entire incident.

45) Thereafter, either defendant's Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan ordered plaintiff to go into a large open cage while still shackled to another inmate. Plaintiff was then unshackled, stood next to other inmates, and ordered to strip naked while standing on the cold floor with no form of floor mat. Plaintiff explained to either defendant's Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan that he was registered under the Jewish faith and was not supposed to disrobe in the presence of other inmates.

46) Either defendant's Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan stated that this was the new policy, and didn't want to hear what plaintiff had to say and ordered plaintiff to place his hands on top of his head, spread his legs and bend over and cough five times, open his mouth, and run his hand between his lips, turn around place his hand against the gate, lift up his left and right foot in the presence of female officers and other inmates.

47) Plaintiff's cloths were thrown on the dirty floor while a second defendant, either, Wayne Murphy, Darian Johnson, Jeremiah Haze, Javier Cruz, Eric Nieves, Chris DiTommaso, Hector Estrella, John Poleini, Fred Hertz, Robert Pullan, or Michael Drapan wearing a gasmask armed with a canister of a chemical agent known as MK9, threatening plaintiff stating, "if you fail to comply or say anything, I will spray you in your face."

48) On the afternoon of April 22, 2015, while returning from court, the entire bus was taken to a search Facility, where a Defendant's Captain Deochan or Garcia, and

either defendant's, Francis Martin, Anthony Johnson, David Whitaker, Jorel Ward, Robert Gottlieb, Daniel Altadonna, Steven Merrill, Joey Torres, George Beazer, Emiel Henry, Ralph Dessoueces, Johnnie Gildon, Louis Finley, David Gonzalez, Gregory McNichlos, William Smith, or William Pincay, wearing all black uniforms with no identification tags armed with canisters of a chemical agent known as MK9 boarded to bus. Defendant's Captain Deochan or Garcia began to yell in a threatening manner stating, "you guys know the drill, stand up and don't say a word. Get the fuck off the bus in a straight line. This is the new policy, if there is any shit, you will be sprayed."

49) Plaintiff and the entire occupants of the bus was ordered to enter the search Facility building in a straight line. Plaintiff was made to stand side by side shackled to another inmate while a female Jane Doe Officer #3 lead a Drug Sniffing-Dog up and down the line on inmates in the front and back of plaintiff. The drug sniffing-dog did not pick up anything during the procedure. Defendant Carolyn Grainger was filming the entire incident.

50) Thereafter, either defendant's, Francis Martin, Anthony Johnson, David Whitaker, Jorel Ward, Robert Gottlieb, Daniel Altadonna, Steven Merrill, Joey Torres, George Beazer, Emiel Henry, Ralph Dessoueces, Johnnie Gildon, Louis Finley, David Gonzalez, Gregory McNichlos, William Smith, or William Pincay, ordered plaintiff to go into a large open cage while still shackled to another inmate. Plaintiff was then unshackled, stood next to other inmates, and order to strip naked while standing on the cold floor with no form of floor mat. Plaintiff explained to either defendant's, Francis Martin, Anthony Johnson, David Whitaker, Jorel Ward, Robert Gottlieb, Daniel Altadonna, Steven Merrill, Joey Torres, George Beazer, Emiel Henry, Ralph Dessoueces, Johnnie Gildon, Louis Finley, David Gonzalez, Gregory McNichlos, William Smith, or William Pincay, that he was registered under the Jewish faith and was not supposed to disrobe in the presence of other inmate.

51) Again either defendant's, Francis Martin, Anthony Johnson, David Whitaker, Jorel Ward, Robert Gottlieb, Daniel Altadonna, Steven Merrill, Joey Torres, George Beazer, Emiel Henry, Ralph Dessoueces, Johnnie Gildon, Louis Finley, David Gonzalez, Gregory McNichlos, William Smith, or William Pincay, stated that this was the new policy, and didn't want to hear what plaintiff had to say and ordered plaintiff to

place his hands on top of his head, spread his legs and bend over and cough five times, open his mouth, and run his hand between his lips, turn around place his hand against the gate, lift up his left and right foot in the presence of female officers and other inmates.

52) Plaintiff's cloths were thrown on the dirty floor while a second defendant, either Francis Martin, Anthony Johnson, David Whitaker, Jorel Ward, Robert Gottlieb, Daniel Altadonna, Steven Merril, Joey Torres, George Beazer, Emiel Henry, Ralph Dessoueces, Johnnie Gildon, Louis Finley, David Gonzalez, Gregory McNichlos, William Smith, or William Pincay, wearing a gasmask armed with a canister of a chemical agent known as MK9, threatening plaintiff stating, "if you fail to comply or say anything, I will spray you in your face."

53) Plaintiff was placed back on the bus, taken to G.M.D.C.; there he was subjected to another full body cavity strip-frisk-search upon entering the facility.

FORTH CAUSE OF ACTION

54-a) Paragraphs 1 through 53 is incorporated herein by reference as though fully set forth.

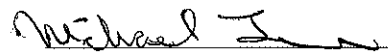
- b. All the above defendant's are sued in their individual and official capacity.
- c. Plaintiff demand(s) a trial by **JURY**.

55) **WHEREFORE**, plaintiff prays that this Court grant the following relief:
1. One Million (1,000,000.00) Compensatory Damages; and **2.** One Million (1,000,000.00); Punitive Damages.

I, Michael Jones, declare under penalty of perjury that the forgoing is true and correct.

DATE: April 22, 2020

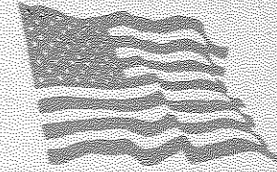
Respectfully submitted


Michael Jones #90-A-5292
Plaintiff, Pro se

Michael Jon - Director

354 Hunter St

Ossining, NY 10562



NEOPOST

FIRST-CLASS MAIL

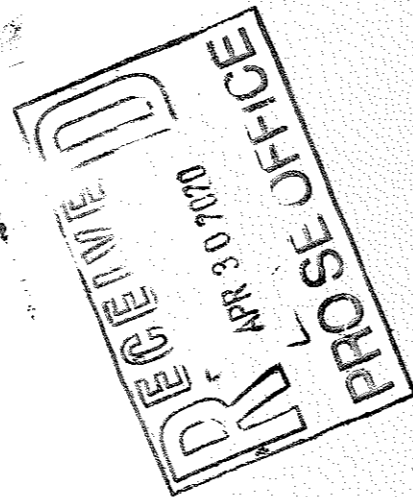
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Pro se Clerks Office
% Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

LEGAL MAIL